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A PROFESSIONAL CORPORATION  
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5 Attorneys for Plaintiffs

6  
7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
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10 **BOARD OF TRUSTEES OF THE SAN MATEO )  
11 HOTEL EMPLOYEES, et al. )**

12 **Plaintiffs,**

13 **vs.**

14 **WESTLODGE HOSPITALITY INC., a )  
15 corporation, doing business as TRAVELODGE )  
and as TRAVELODGE SAN FRANCISCO )  
AIRPORT NORTH, )**

16 **Defendants. )**  
17

**NO. C 07 3357 JL**

**DECLARATION OF MICHAEL  
J. CARROLL IN SUPPORT OF  
MOTION FOR ENTRY OF  
DEFAULT**

18 I, MICHAEL J. CARROLL, declare:

19 1. I am duly admitted to practice law before all of the courts of the State of California  
20 and in the United States District Court, Northern District of California. I am one of the attorneys for  
21 plaintiff in this action. I have personal knowledge of the facts stated herein and if called as a witness,  
22 I could competently testify as follows:

23 2. The complaint and summons in this action were served on defendants, WESTLODGE  
24 HOSPITALITY INC., a corporation, doing business as TRAVELODGE and as TRAVELODGE SAN  
25 FRANCISCO AIRPORT NORTH , on July 12, 2007 as appears from the proofs of service of said  
26 summons e-filed with the Court.

27 3. The time within which the defendants may answer or otherwise move as to the  
28 complaint has expired, that defendants have not answered or otherwise moved and that the time for

1 defendants to answer or otherwise move has not been extended.

2 I declare under penalty of perjury that the foregoing is true and correct.

3 Executed on August 22, 2007 at San Francisco, California.

4  
5 /s/ Michael J. Carroll  
6 MICHAEL J. CARROLL  
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**PROOF OF SERVICE BY MAIL**

I am a citizen of the United States and employed in the City and County of San Francisco, California. I am over the age of eighteen years and not a party to the within above entitled action; my business address is 220 Montgomery Street, Suite 303, San Francisco, California 94104. On August 22, 2007 I served the within **MOTION FOR ENTRY OF DEFAULT, DECLARATION OF MICHAEL J. CARROLL IN SUPPORT OF MOTION FOR ENTRY OF DEFAULT and PROPOSED NOTICE OF ENTRY OF DEFAULT** on the defendant in said action, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States post office mail box at San Francisco, California, addressed as follows:

Rafaela David  
c/o Westlodge Hospitality Inc.  
326 S. Airport Blvd.  
S. San Francisco, CA 94080

I, SHARON EASTMAN, certify (or declare), under penalty of perjury that the foregoing is true and correct.

Executed on August 22, 2007 at San Francisco, California.

/s/ Sharon Eastman